

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO.
)	
Plaintiff,)	
)	INDICTMENT
vs.)	
)	[21 U.S.C. §§ 846 &
SEAN SMITH,)	841(a)(1)]
)	
Defendant.)	
)	

INDICTMENT

The Grand Jury charges that:

A. General Allegations

From a time unknown but by January, 2000, and continuing to at least June 13, 2003, in the District of Hawaii, SEAN SMITH, defendant herein, willfully conspired together with Jack Frisbee, Roy Frisbee, Anthony Valentin and Doug Farias, a/k/a "Hollywood" (co-conspirators but not defendants herein), and with other persons known and unknown to the Grand Jury, to distribute and to possess with intent to distribute, in excess of 500 grams of a mixture or

substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (a Schedule II controlled substance), in violation of Title 21, United States Code, Sections 841(a)(1).

B. Manner and Means of the Conspiracy

It was the objective of this conspiracy that pound quantities of methamphetamine would be obtained on the U.S. mainland on an ongoing basis, and transported to the State of Hawaii, to be distributed in Hawaii. It was also an objective in this conspiracy that monetary drug proceeds, obtained from the unlawful distribution of methamphetamine in Hawaii, would be collected in Hawaii and transported to conspirators on the U.S. mainland. In furtherance and during the existence of this conspiracy, the defendant and conspirators named in this Indictment participated in the conspiracy, in Hawaii and elsewhere, as follows:

1. SEAN SMITH arranged to have pound quantities of methamphetamine sent from the U.S. mainland to locations in Hawaii which were specified by Jack Frisbee. SEAN SMITH also received (in California) monetary drug proceeds collected in Hawaii from the distribution of methamphetamine in Hawaii.

2. Jack Frisbee arranged with SEAN SMITH to obtain pound quantities of methamphetamine from a drug source (or sources) on the U.S. mainland, and, for SEAN SMITH to have such quantities of methamphetamine sent to specified locations in Hawaii, to be distributed in Hawaii.

3. Roy Frisbee received pound quantities of methamphetamine (in Hawaii) sent from the U.S. mainland, and, delivered such quantities of methamphetamine to other persons in Hawaii, including Doug Farias and Anthony Valentin. Roy Frisbee also received (in Hawaii) monetary proceeds of drug trafficking activity. Roy Frisbee delivered monetary proceeds of drug trafficking activity to an individual known as "J.J." (who is also a conspirator herein) in Hawaii, so that such monetary drug proceeds would be transported by "J.J." from Hawaii to SEAN SMITH on the U.S. mainland.

4. Anthony Valentin received pound quantities of methamphetamine, delivered methamphetamine to other persons, and, sold methamphetamine. Valentin also received monetary proceeds of drug trafficking activity and delivered such proceeds to the conspirator known as "J.J." in Hawaii, so that such monetary drug proceeds would be transported by "J.J." from Hawaii to SEAN SMITH on the U.S. mainland.

5. Doug Farias received pound quantities of methamphetamine in Hawaii, and caused such methamphetamine to be provided to Hawaii drug "dealers" (for distribution/sale in Hawaii). Farias also collected and delivered monetary drug proceeds to Roy Frisbee.

C. FRUITS OF THE CONSPIRACY

During the existence of the conspiracy alleged herein and in furtherance of its objectives, and by manner and means described above:

The defendant SEAN SMITH and conspirators named herein caused more than three hundred (300) pounds of methamphetamine to be transported to, and distributed in, Hawaii. Additionally, the defendant SEAN SMITH and conspirators named herein caused at least six million (\$6,000,000) dollars in monetary drug proceeds to be transported from Hawaii to California.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A).

DATED: 2/9/05, 2005, at Honolulu, Hawaii.

A TRUE BILL

15/
FOREPERSON, Grand Jury

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United States v. Sean Smith
Cr. No.
"Indictment"